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*Attorneys for Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
JAMES MESTERHARM OF AP SERVICES,
LLC**

Related Doc: Dkt. Nos. 867, 868, 1299

Pursuant to 28 U.S.C. § 1746, I, James Mesterharm, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. I am duly authorized to execute this declaration on behalf of AP Services, LLC (“**APS**”), an affiliate of AlixPartners LLP.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

4. I am filing this supplemental declaration to supplement the disclosures that were included in my original declaration dated March 13, 2019 [ECF No. 867].

5. Unless otherwise noted, references to AP below collectively refer to AP Holdings, LLP, APS, and each of their respective subsidiaries. APS wishes to disclose the following:

- Argo, Argo Global London, Argo International Holdings Limited and Argo Re Ltd, insurance providers, litigation parties and surety bond parties to the Debtors, and affiliates (“**Argo**”) are customers, insurance providers, bondholders, lenders and litigation parties to current and former AP clients in matters unrelated to the Debtors. Argo is an insurance provider to AP.
- Berkley Insurance Company, Berkley National Insurance Company and Berkley Regional Insurance Company, insurance providers, surety bond parties and litigation parties to the Debtors, and affiliates (“**Berkley**”) are insurance providers, adverse parties and bondholders to current and former AP clients in matters unrelated to the Debtors. Berkley is an insurance provider to AP.
- Complete Discovery Source, Inc., a professional in this bankruptcy matter, is a former employer of a current AP employee.
- Cravath Swaine & Moore, a professional in this bankruptcy matter, is a former employer of a current AP employee.
- Ironshore Insurance Limited an insurance provider and surety bond party to the Debtors, is an insurance provider to AP.
- J. Frank Associates, LLC (dba Joele Frank, Wilkinson Brimmer Katcher), a professional in this bankruptcy matter, is a material contract party, professional, and vendor to current and former AP clients in matters unrelated to the Debtors. In addition, the spouse of a current AP employee is a partner at Joele Frank. The spouse is the lead professional at Joele Frank, representing Pacific Gas & Electric.

- Proskauer Rose LLP (“**Proskauer**”), a professional in this bankruptcy matter, is an adverse party to Jay Alix, with respect to the McKinsey litigation matter previously disclosed.
- Ropes & Gray, a professional in this bankruptcy matter, also represents an AP board member on personal legal matters, all of which are in matters unrelated to the Debtors.
- Southern Power and Southern Power Company, contract counterparties and notice of appearance parties to the Debtors, and affiliates (“**SP**”) are lessors and litigation parties to current and former AP clients in matters unrelated to the Debtors. SP is a current and former AP client in matters unrelated to the Debtors.
- SunEdison Yield Co ACQ2 LLC, a contract counterparty to the Debtors and a parent company of two PG&E Energy procurement power purchase agreement companies, and affiliates (“SunEdison”), is a former AP client in matters unrelated to the Debtors. In addition, an AP Board Member owns a creditor affiliate that has litigation pending in the SunEdison Chapter 11 Estate, and is pursuing claims against McKinsey RTS, a professional in that estate, and a creditor in this estate. The litigation does not involve AP or this chapter 11 case.

5. APS does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement APS’ disclosures in the event that APS discovers any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, APS will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

1 I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true
2 and correct.

3 Dated: April 11, 2019

4 AP Services, LLC

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7 James Mesterharm
8 Authorized Representative
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